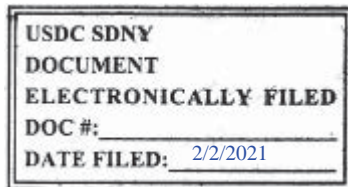




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January 28, 2021

BY ECF

Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007-1312

Re: *C.Q. et al. v. New York City Dep't of Educ. et al.*,
21-CV-00003 (AJN)

Dear Judge Nathan:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel assigned to represent the New York City Department of Education, New York City Board of Education and Chancellor Richard Carranza, in the above-referenced matter. I write pursuant to Your Honor's Individual Rules of Practice § 1(D) to respectfully request additional time to respond to the Complaint. Plaintiff consents to the proposed extension of time.

The defendant's response to the Complaint is currently due February 1, 2021. I respectfully request the Court extend the time for the defendant to respond to the Complaint until April 2, 2021. The additional time is needed to investigate the claims, more clearly ascertain the status of the agency's implementation efforts, attempt to resolve the substantive implementation issues, and ideally allow the parties an opportunity to resolve attorney's fees. This is the first such request the defendant has made for an extension of time.

Elisa Hyman, Esq., counsel for Plaintiffs, consents to the proposed extension of time to respond to the Complaint. Your Honor has currently scheduled an initial conference in this matter on March 26, 2021, which will be affected by the proposed extension of time to respond to the Complaint. Thus, defendants separately request the Court adjourn the initial conference on March 26, 2021. Pursuant to Your Honor's Individual Rules of Practice § 1(D), the parties propose the following Friday afternoons as alternate dates for the initial conference: April 9, 2021, April 16, 2021, or April 23, 2021.

The Defendant's time to respond to the Complaint is extended to April 2, 2021. The initial pretrial conference is hereby adjourned to April 23, 2021 at 3:00 p.m.
SO ORDERED.

Alison J. Nathan

2/2/2021

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Thais R. Ridgeway
Assistant Corporation Counsel

CC: **BY ECF**

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